

COLE SCHOTZ P.C.
500 Delaware Avenue, Suite 1410
Wilmington, Delaware 19801
Tel: (302) 655-5000
Fax: (302) 658-6395
Justin R. Alberto (admitted *pro hac vice*)

*Efficiency Counsel to the Official Committee of
Unsecured Creditors of Purdue Pharma L.P., et al.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
PURDUE PHARMA L.P., <i>et al.</i> ,	:	Case No. 19-23649 (RDD)
	:	
Debtors. ¹	:	(Jointly Administered)
.....	:	

**SECOND SUPPLEMENTAL DECLARATION OF JUSTIN R. ALBERTO IN
SUPPORT OF APPLICATION OF THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ENTRY OF AN ORDER AUTHORIZING
RETENTION AND EMPLOYMENT OF COLE SCHOTZ P.C. AS EFFICIENCY
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,
NUNC PRO TUNC TO FEBRUARY 24, 2020**

I, Justin R. Alberto, hereby declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury as follows:

1. I am a Member of the law firm of Cole Schotz P.C. ("Cole Schotz"), which maintains offices for the practice of law at 500 Delaware Avenue, Suite 1410, Wilmington, Delaware. Cole Schotz also maintains offices in Boca Raton, Florida; Baltimore,

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Maryland; Hackensack, New Jersey; New York, New York; Dallas, Texas; and Fort Worth, Texas.

2. I am familiar with the matters set forth herein and make this supplemental declaration (the “Supplemental Declaration”) in connection with the *Application for an Order Authorizing and Approving the Employment and Retention of Cole Schotz P.C. as Efficiency Counsel to the Official Committee of Unsecured Creditors* (the “Committee”) *Nunc Pro Tunc to February 24, 2020* [ECF No. 1013] (the “Application”)² filed on April 3, 2020, my initial declaration attached as Exhibit B to the Application (the “Initial Declaration”), and the *Supplemental Declaration of Justin R. Alberto in Support of Application for an Order Authorizing and Approving the Employment and Retention of Cole Schotz P.C. as Efficiency Counsel to the Official Committee of Unsecured Creditors Nunc Pro Tunc to February 24, 2020* [ECF No. 1654].

3. As set forth in the Application, which was granted by this Court on April 24, 2020 [ECF No. 1084], Cole Schotz committed to file a supplemental declaration pursuant to Bankruptcy Rule 2014 to the extent new information was relevant to the Application and merited disclosure. *See* Initial Declaration ¶ 3. Accordingly, in connection with Cole Schotz’s representation of the Committee, I submit this Supplemental Declaration to provide the additional disclosure set forth herein.

Specific Disclosure

4. On October 27, 2020, the United States Trustee for Region 3 appointed an Official Committee of Opioid-Related Claimants (the “Mallinckrodt Opioid Committee”) in the chapter 11 cases of Mallinckrodt plc and its affiliated debtors (the “Mallinckrodt

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

Debtors”), which cases are pending before the United States Bankruptcy Court for the District of Delaware. *See Notice of Appointment of Opioid Related Claimants, In re Mallinckrodt plc, et al.*, Case No. 20-12522 (JTD) (Bankr. D. Del. Oct. 27, 2020) [ECF No. 308]. The Mallinckrodt Debtors include multiple entities that were named as co-defendants with the Debtors in various prepetition lawsuits arising from the opioid crisis, and such entities may hold contingent common law contribution claims against the Debtors. In addition, the Debtors may hold contingent common law contribution claims against the Mallinckrodt Debtors.

5. The Mallinckrodt Opioid Committee has selected Cole Schotz as its Delaware and efficiency counsel, effective as of October 27, 2020. Cole Schotz is currently engaged in conflict checks and anticipates filing an application to be retained by the Mallinckrodt Opioid Committee in the near future. For the avoidance of doubt, in the Debtors’ chapter 11 cases, Cole Schotz does not represent any Mallinckrodt Debtor. In addition, in the Debtors’ chapter 11 cases, Cole Schotz will abstain from being involved in any issues regarding Mallinckrodt’s claims (if any) against the Debtors. In the Mallinckrodt chapter 11 cases, Cole Schotz will abstain from being involved in any issues regarding the Debtors’ claims (if any) against Mallinckrodt.

6. I do not believe that Cole Schotz’s engagement on behalf of the Mallinckrodt Opioid Committee precludes Cole Schotz from meeting the requirement of Bankruptcy Code section 1103(b) that an attorney may not “represent any other entity having an adverse interest in connection with the case.”

7. Cole Schotz has discussed its representation of the Committee and the Mallinckrodt Opioid Committee with counsel to the Debtors in these cases, and counsel to the Mallinckrodt Debtors.

8. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 6, 2020

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

Justin R. Alberto (No. 5126)
500 Delaware Ave., Suite 1410
Wilmington, DE 19801
Telephone: 302-652-3131
Fax: 302-652-3117
jalberto@coleschotz.com